



PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.: 09/740,585
Filing Date: December 18, 2000
Applicant: Jeffrey Morgan Alden
Group Art Unit: 2178
Examiner: Joshua D. Campbell
Title: FUNCTIONAL VISUALIZATION OF SPREADSHEETS
Attorney Docket: GP-300849

APPELLANT'S REPLY BRIEF

This is Appellant's Reply Brief filed in accordance with 37 CFR §1.193(b) in response to the Examiner's Answer mailed January 27, 2005. This Reply Brief is being submitted in triplicate.

Appellant has argued in their Brief that Brandywine does not teach or suggest automatically updating the visual representation in response to changes made to the spreadsheet because a user of the Brandywine xlNavigator must perform a "click" step for changes made in the spreadsheet to be shown in the visual representation. The Examiner states on page 7 of the Examiner's Answer that "[t]echnically, Brandywine discloses a method in which the equivalence is maintained automatically because when the user clicks the update button the computer changes all of the values automatically, not manually," Appellant submits that as discussed in the specification and throughout the prosecution of this application, Appellants' position has been consistent that automatic in this context means that a user of Appellant's system does not have to do anything when a change is made to the spreadsheet for that change to be shown in

the visual representation. Brandywine clearly does not provide this automatic operation.

The Examiner has used Himmel to show a technique for maintaining an automatic equivalence between two representations of a computer document. However, Appellant has argued that it is improper under *prima facie* obviousness to combine Brandywine and Himmel because the Himmel method of automatically changing a bookmark representation of a corresponding webpage if a change is detected in the webpage is unrelated to Appellant's claimed invention of coupling a spreadsheet and a visual representation of the spreadsheet.

Appellant has further argued that it is not possible in the Brandywine xlnavigator to directly make a change to the visual representation, and specifically, directly make a change to the visual representation that is automatically shown in the spreadsheet. The Examiner has provided additional pages of Brandywine, previously not of record in the application, to teach this feature of Appellant's invention. The Examiner states on page 8 of the Answer that:

anytime a user selects an item in the visual representation such as item 2 on page 1 or item 6 on page 2 of the addendum, the color of said item changes. In response to this the color of the corresponding item in the spreadsheet automatically changes with the item in the visual representation, which can be shown by the correlation of item 1 and 2 on page 2 and item 6 and 7 on page 2 of the addendum. This proves that a functional equivalence is maintained when changes, in this case a change in color, occur in the visual representation as stated on page 3 of Brandywine under the section labeled "Key benefits" in which it states "Direct link between xlnavigator representation and Excel spreadsheet cells.

Appellant submits that the direct link between xlnavigator representation and Excel spreadsheet cells is provided by the fact that changes made to the spreadsheet are shown in the visual representation after the user clicks the update button. Assuming that the Brandywine xlnavigator does allow an item in the visual representation to be

selected, and the color of the selected item does change, and the corresponding item in the spreadsheet also changes to the same color, **Appellant submits that this does not show that changes can be made directly to the visual representation that are then automatically shown in the spreadsheet.** Appellant submits that all this shows is that the Brandywine xNavigator allows the user to know which cell in the visual representation is related to the corresponding item in the spreadsheet. The user cannot make a change to that item in the visual representation, that is then reflected in the spreadsheet, as is possible in Applicant's claimed invention.

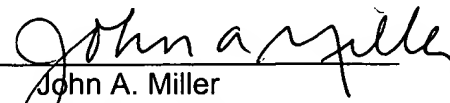
Appellant submits that the Examiner is reading more into the sentence "Direct link between xNavigator representation and Excel spreadsheet cells" than is capable by the Brandywine xNavigator. Appellant submits that the Examiner's statement "which means anytime a change is made to the visual representation it is reflected in the spreadsheet and vice versa" (page 10, Examiner's Answer) is not supported by Brandywine as discussed herein and in Appellant's Brief.

With regard to dependent claims 4 and 13, Appellant submits that previously unsubmitted addendum page 1 of Brandywine does not teach employing an automatic design layout algorithm to configure the entities because there is no detail of the layout menu.

With regard to dependent claims 7, 15 and 21, Appellant submits that new addendum page 1 does not show creating multiple identical entities in the visual representation if data cells are repeatably used in the spreadsheet because A1[6] and D1[6] are not identical.

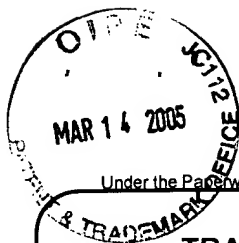
For the reasons given in Appellant's Brief and Appellant's Reply Brief above, it is respectfully submitted that claims 1-22 are not obvious in view of the combination of Brandywine and Himmel. It is therefore respectfully requested that the Examiner's Final Rejection under 35 USC §103(a) be reversed, and that Appellant's claims be allowed.

Respectfully submitted,

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